

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>SUZANNE MILLER</b> <b>Plaintiff</b>	:	<b>CIVIL ACTION</b>
	:	
	:	
v.	:	
	:	<b>NO. 04-cv-4777</b>
<b>ROBERT FORNEY, et al.</b> <b>Defendants.</b>	:	
	:	

**SETTLEMENT MEMORANDUM**

1. This matter shall be dismissed with prejudice in accordance with Local Rule 41.b.
2. Plaintiff shall execute a general release within 30 days of this Settlement Memorandum
3. Defendant, Lehigh County Housing Authority, shall pay the gross amount of \$55,000 made out to Plaintiff, Suzanne Miller, and Don Bailey, her attorney, within 5 business days of the execution of the release. This amount is paid in full settlement (including counsel fees and costs) of Plaintiffs' claims against Lehigh County Housing Authority.
4. This settlement is made on behalf of Lehigh County Housing Authority only, and not the other Defendants. Pursuant to this Settlement Memorandum, Plaintiff withdraws with prejudice all claims against the other Defendants: Robert Forney, Ron Unger, John Seitz, Dan Beers, Kent Herman, and Valley Housing Development Corporation.
5. Plaintiff agrees to indemnify Lehigh County Housing Authority for any tax penalties associated with this settlement agreement.

6. Plaintiff, Suzanne Miller, agrees not to reapply for any job with Lehigh County Housing Authority.
7. The Parties agree that Judge Paul S. Diamond will serve as the final arbiter of all disputes relating to this Memorandum of Understanding.

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**Don Bailey**  
**Bailey, Stretton & Ostrowski**  
  
**On Behalf of Plaintiff**

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**Joseph Goldberg**  
**Weber Gallagher Simpson**  
**Stapleton Fires & Newby LLP**  
**On Behalf of Defendant**

**Dated: September 28, 2005**

This Settlement Memorandum is ENTERED as an ORDER of this Court, on this 28th Day of September, 2005.

**BY THE COURT:**

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**Paul S. Diamond, J.**